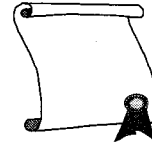


ENVIRONMENTAL/WASTE COMPLIANCE GUIDANCE



ENVIRONMENTAL LEADERSHIP TEAM

ENVIRONMENTAL/WASTE COMPLIANCE GUIDANCE No. 27 LEAD BASED PAINT (LBP) AND LBP DEBRIS DISPOSAL

Guidance

LBP debris is defined as any solid material that results from the demolition of RFETS building structures that are wholly coated or partially coated by LBP at the time of demolition. LBP is defined as any paint or coating which uses the heavy metals barium, cadmium, chromium, and/or lead as primary or secondary pigments.

RFETS LBP debris shall be managed as follows:

1. LBP debris generated outside of currently identified High Contamination Areas (HCA's) shall be managed as non-hazardous (solid) wastes. Additional analysis for characteristics of hazardous waste derived from LBP is not a requirement for disposal.
2. LBP debris within currently identified HCA's shall be managed as D008 RCRA hazardous wastes unless sampling and analysis demonstrates otherwise.
3. LBP removed from infrastructure by scabbling shall be managed as D008 RCRA hazardous wastes unless sampling and analysis of the removed LBP demonstrates otherwise.
4. Paint incidentally removed during demolition activities will be managed as non – hazardous if the incidentally removed paint remains associated with the building debris.
5. Waste waters generated during scabbling or removal of LBP shall be managed as a process waste only, and are subject to sampling and analysis to meet the input limitations of RFETS process waste system. Waters in contact with LBP SHALL NOT be placed into the RFETS sanitary or storm sewerage lines.
6. Scabbled or removed paint, if generated under a CDPHE approved Demolition Operation Plan (DOP) or Closure Decision Document (CDD) can be stabilized at RFETS to remove the characteristics of heavy metal leachability. The treatment must be conducted in compliance with state and federal requirements specified in the DOP or CDD.

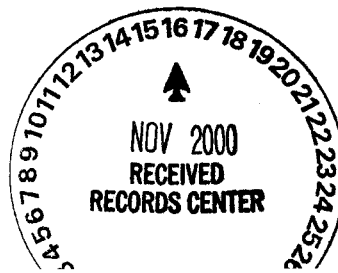
Background

LBP and LBP debris is currently subject to Solid Waste Disposal Act / Resource Conservation and Recovery Act (SWDA/RCRA) disposal regulations. Rocky Flats Environmental Technology Site management requirements must comply with current regulations as well as anticipate proposed regulations.

6/7/99

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ADMIN RECORD

SW-A-004187

Based on a review of paint sample data, Rocky Mountain Remediation Services (RMRS) has determined that the lead paint use on site does not contribute sufficient heavy metal contamination to require RCRA management of painted rubble. This disposal management guidance addresses disposal requirements only, and does not invoke or preclude any Occupational Safety and Health Administration (OSHA) requirements imposed in the management of LBP and LBP debris. Proposed Toxic Substance Control Act (TSCA) regulations associated with PCB based paint are not addressed by this guidance.

Contact the waste generator support group for more specific information regarding LBP WSRIC and WGI requirements.

ELT Concurrence:

<u> /s/ </u>	<u> 6/4/99 </u>
Karan North	Date

<u> /s/ </u>	<u> 6/4/99 </u>
Ted Hopkins	Date

<u> /s/ </u>	<u> 6/4/99 </u>
Bill Wierzbicki	Date

<u>Mike Papp for</u>	<u> 6/4/99 </u>
Kevin Nell	Date